

EXHIBIT 83

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST)	
PUBLISHING CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	
)	
vs.)	C.A. No. 20-613 (LPS)
)	
ROSS INTELLIGENCE, INC.,)	
)	
Defendant and)	
Counterplaintiff.)	
)	
)	

HIGHLY CONFIDENTIAL

VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT,

by and through its corporate designee

TOMAS VAN DER HEIJDEN,

(also in his individual capacity)

London, England, United Kingdom

Thursday, March 17, 2022

Pages: Pages 1 - 443

Reported stenographically by:
LEAH M. WILLERSDORF, RPR-CRR-FBIVR-ACR-QRR2-CLR

Thursday, March 17, 2022

09:29 a.m.
(Greenwich Mean Time)

Videotaped 30(b)(6) deposition of Defendant, by and through its corporate representative Tomas van der Heijden, as well as in his individual capacity, held at the offices of Kirkland & Ellis International LLP, 30 St. Mary Axe, London EC3A 8AF, England, United Kingdom, before Leah Willersdorf, Registered Professional Reporter and Certified Realtime Reporter with the US National Court Reporters Association, and Accredited Court Reporter, Qualified Realtime Reporter (Level 2) and Fellow of the British Institute of Verbatim Reporters, and Certified LiveNote Reporter.

A P P E A R A N C E S

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ALSO PRESENT:

Linda Fleet - Videographer

WITNESS INDEX

Witness:	Page
TOMAS VAN DER HEIJDEN	
Examination by Mr. Simmons	15
Examination by Mr. Ghaffari	387
Further Examination by Mr. Simmons	420

REQUEST FOR PRODUCTION

	Line	Page
Document request	19	104

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 1	Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's Notice of 30(b)(6) Deposition of Defendant Ross Intelligence Inc. (13 pages, no Bates)	18
Exhibit 2	Email string, with the most recent being from Kayvan Ghaffari to Miranda Means, et al., dated March 11, 2022 (1 page, no Bates)	18
Exhibit 3	Document entitled "Powered by IBM Watson Application - Executive Summary," with metadata attached (ROSS-003705907 - 908) [Highly Confidential - Attorneys' Eyes Only]	71
Exhibit 4	ROSS Intelligence Terms of Service, with a Last Modified date of April 28, 2020 (TR-0001142 - 153)	87
Exhibit 5	Email string, with the most recent being from Andre Garber to Andrew Arruda, dated October 19, 2015 (ROSS-003390881 - 884) [Highly Confidential]	100
Exhibit 6	Thomson Reuters General Terms and Conditions, as of July 2015 (WPC-0001475 - 476) [Highly Confidential]	103

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 7	Email from Akash Venkat to Jimoh Ovbiagele, dated February 26, 2015 (ROSS-003390586 - 587) [Highly Confidential]	141
Exhibit 8	Slack communication between Jimoh Ovbiagele and Andrew Arruda, dated February 17, 2015, headed "[Slack] Notifications from the Ross Inc team for Feb 16th, 2015" [Highly Confidential]	145
Exhibit 9	Email string, with the most recent being from Thomas Hamilton to Andrew Arruda, dated May 11, 2015 (ROSS-003390869 - 871) [Highly Confidential]	149
Exhibit 10	Email string, with the most recent being from Andrew Arruda to Thomas Hamilton, et al., dated August 6, 2015 (ROSS-003389778 - 779) [Highly Confidential]	152
Exhibit 11	Email string, with the most recent being from Thomas Hamilton to Andrew Arruda, et al., dated September 25, 2015 (ROSS-003389728 - 730) [Confidential]	155
Exhibit 12	Email string, with the most recent being from Will Webb to Mahesh Krishnan, et al., dated November 23, 2016 (ROSS-003390101 - 105) [Highly Confidential]	158

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 13	Email from Thomas Hamilton to John Fernandez, dated August 2015 (ROSS-003390233) [Highly Confidential]	163
Exhibit 14	Email string, with the most recent being from David Houlihan to Tomas van der Heijden, et al., dated December 14, 2016 (ROSS-003390050 - 052) [Highly Confidential]	165
Exhibit 15	Slack conversation between Tomas van der Heijden and Thomas Hamilton, headed "D1NFRAAUS: 2016-12-05" (ROSS-010241185 - 191) [Confidential]	169
Exhibit 16	Slack conversation between Tomas van der Heijden and Sean Semmler, headed "D5A76KC75: 2017-06-29" (ROSS-010361787 - 789) [Highly Confidential - Attorneys' Eyes Only]	171
Exhibit 17	Email string, with the most recent being from Tomas van der Heijden to Rohit Jayawardhan, dated October 23, 2017 (ROSS-003389945 - 946) [Highly Confidential]	175
Exhibit 18	Email string, with the most recent being from Tomas van der Heijden to Rohit Jayawardhan, dated October 27, 2017 (ROSS-003389960 - 61) [Highly Confidential]	179

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 19	Screenshot of the Practice Areas section of the Thomson Reuters Westlaw website, and is attachment to an email in Exhibit 18 (ROSS-009706035) [Confidential]	179
Exhibit 20	Email string, with the most recent being from Tomas van der Heijden to Ashley Stenning, dated November 21, 2017 (ROSS-003390062 - 065) [Highly Confidential]	184
Exhibit 21	Email exchange between Charles Von Simson and Tomas van der Heijden, dated May 24, 2018 (ROSS-009601555) [Highly Confidential - Attorneys' Eyes Only]	189
Exhibit 22	Email string, with the most recent being from Sean Shafik to Tomas van der Heijden, dated May 25, 2018 (ROSS-003390073 - 075) [Highly Confidential]	194
Exhibit 23	Email string, with the most recent being from Tomas van der Heijden to Charles von Simson, dated May 28, 2018 (ROSS-003390071 - 072) [Highly Confidential]	204

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 24	Thomson Reuters NACI (New Account/Credit Increase) Form, with the subscriber being Charles von Simson, dated May 30, 2018 (ROSS-003390024 - 025) [Highly Confidential]	206
Exhibit 25	Email from Charles von Simson to Tomas van der Heijden, et al., dated June 5, 2018 (ROSS-003389931) [Highly Confidential]	208
Exhibit 26	Document entitled "List of 20 items from Charles von Simson All History," which is the attachment to Exhibit 25, with metadata attached (ROSS-003389932 - 935) [Highly Confidential]	208
Exhibit 27	Email from Charles von Simson to Thomas Hamilton, et al., dated November 15, 2018 (ROSS-003389911) [Highly Confidential]	210
Exhibit 28	Thomson Reuters order form for Westlaw Edge, with the account address of Charles von Simson (ROSS-003389928 - 930) [Highly Confidential]	215

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 29	Slack conversation between various people, dated December 5, 2018, headed "Product Feedback: 2018-12-05" (ROSS-009731365 - 369) [Highly Confidential - Attorneys' Eyes Only]	217
Exhibit 30	Slack conversation between Tomas van der Heijden and Andrew Arruda, dated May 31, 2019, headed "mpdm-tomasvdh-findingjimoh-andrewarruda-sean.s-1: 2019-05-31" (ROSS-023018772) [Confidential]	220
Exhibit 31	Slide deck entitled "Mini-Project 1: Legal Research Software Market," with metadata attached (ROSS-003386670 - 683) [Confidential]	231
Exhibit 32	Email string, with the most recent being from Akash Venkat to Jimoh Ovbiagele, et al., dated October 27, 2015 (ROSS-023018166 - 167) [Confidential]	234
Exhibit 33	Email string, with the most recent being from Sean Shafik to Andrew Arruda, et al., dated September 17, 2018 (ROSS-010151565 - 570) [Confidential]	243

EXHIBIT INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 34	Email string, with the most recent being from Scott Sperling to Thomas Hamilton, dated June 22, 2018 (ROSS-003390234 - 236) [Highly Confidential]	256
Exhibit 35	Document entitled "ROSS v. Westlaw - Results Compared," with metadata attached (ROSS-003419039 - 041) [Highly Confidential - Attorneys' Eyes Only]	259
Exhibit 36	Email from Tomas van der Heijden to maxim@rossintelligence.com, dated January 15, 2019 (ROSS-003268059) [Confidential]	266
Exhibit 37	Slide deck entitled "Judicial Interpretations of Statutes and Regulations (JI)," with metadata attached (ROSS-023018710 - 736) [Confidential]	276
Exhibit 38	Email string, with the most recent being from Thomas Hamilton to Tariq Hafeez, et al., dated October 14, 2015 (ROSS-000271277 - 302) [Confidential]	291
Exhibit 39	Slide deck entitled "Memoranda workflow - ROSS," produced in native format, with metadata attached (ROSS-000061913 - 61913.16)	299

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 40	Email from Sean Shafik to Tomas van der Heijden, dated April 5, 2019 (ROSS-009603341) [Highly Confidential - Attorneys' Eyes Only]	304
Exhibit 41	Statement of Work pursuant to the Master Services Agreement, dated October 15, 2015 (ROSS-000251670 - 671) [Confidential]	308
Exhibit 42	Email string, with the most recent being from Jimoh Ovbiagele to Tomas van der Heijden, dated December 22, 2017 (ROSS-003276744 - 745) [Confidential]	312
Exhibit 43	Email string, with the most recent being from Thomas Hamilton to David McElhoe, dated October 30, 2015 (ROSS-003343202 - 207) [Attorneys' Eyes Only]	313
Exhibit 44	Document headed "Memorandum #5" (LEGALEASE-00069484 - 487)	333
Exhibit 45	Email string, with the most recent being from Tomas van der Heijden to Teri Whitehead, et al., dated November 13, 2017 (ROSS-000204366 - 367) [Confidential]	340

EXHIBITS INDEX

van der Heijden Exhibit No.	Description	Page
Exhibit 46	Email string, with the most recent being from Teri Whitehead to Tomas van der Heijden, et al., dated December 22, 2017 (ROSS-000204216 - 218) [Confidential]	347
Exhibit 47	License Agreement between Lawriter LLD and ROSS Intelligence, Inc., effective as of October 1, 2016 (ROSS-023018180 - 183) [Confidential]	353
Exhibit 48	Document re Fastcase potentially acquiring ROSS, headed "Audience," with metadata attached (ROSS-003695819 - 824) [Confidential]	358
Exhibit 49	Third-party ROSS Intelligence, Inc.'s Opposition to Plaintiff's Motion to Compel Production of Documents in Response to Subpoena in the West Publishing Corporation vs. LegalEase case (ROSS-001782470 - 489)	368
Exhibit 50	Email string, with the most recent being from Graham Toppin to Tomas van der Heijden, et al., dated February 5, 2018 (ROSS-023018279 - 281) [Confidential]	374

(On the record at 9:29 a.m.)

THE VIDEOGRAPHER: We are now on the record. My name is Linda Fleet. I am a videographer retained by Philadelphia.

This is a video deposition for the United States District Court for the District of Delaware.

Today's date is March 17, 2022, and the video time is 9:30 a.m.

This deposition is being held at Kirkland & Ellis, 30 St. Mary Axe, London EC3A 8AF, United Kingdom, in the matter of Thomson Reuters Enterprise Centre GmbH, versus ROSS Intelligence, Inc.

The deponent is Tomas van der Heijden.

Would all counsel please voice-identify themselves.

MR. SIMMONS: This is Joshua Simmons from Kirkland & Ellis. With me is Jennifer Gibbins who is also from Kirkland & Ellis. We are here on behalf of the plaintiffs.

MR. GHAFARI: My name is Kayvan Ghaffari of Crowell & Moring, LLP, here on behalf of the witness and defendant/counterplaintiff ROSS Intelligence, Inc.

THE VIDEOGRAPHER: The court reporter is Leah Willersdorf and will now swear in the witness.

TOMAS VAN DER HEIJDEN,
having been duly sworn,
was examined and testified as follows:

EXAMINATION ON BEHALF OF
PLAINTIFFS/COUNTERDEFENDANTS

BY MR. SIMMONS:

Q. Would you please state your name for the record.

A. It's Tomas van der Heijden.

Q. And what's your address?

A. 37 Fehrbelliner Strasse, Berlin, Germany.

Q. Are you currently employed?

A. I am, yeah.

Q. By what company?

A. It's called Briink Intelligence.

Q. And what do they do?

A. Produce sustainable finance reporting.

Q. What's your role at Briink Intelligence?

A. I'm the CEO and cofounder.

Q. What's your relationship to ROSS Intelligence, the defendant in this case?

A. I'm a former employee.

Q. What was your role as an employee when you left the company?

A. I was the VP Product and Legal.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A horizontal bar chart with 20 bars of varying lengths. The bars are arranged in a single column. The lengths of the bars represent percentages, with the longest bar at the top and the shortest bar at the bottom. The bars are colored in a light blue-grey shade.

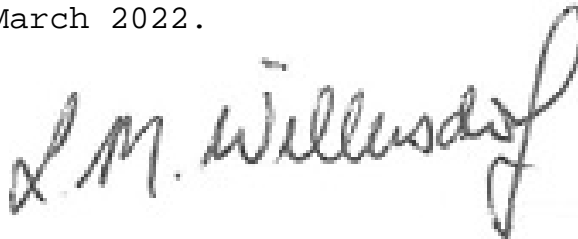
Category	Percentage
1	95%
2	100%
3	98%
4	15%
5	95%
6	98%
7	75%
8	98%
9	45%
10	60%
11	95%
12	90%
13	95%
14	98%
15	100%
16	98%
17	100%
18	45%
19	100%
20	60%
21	45%
22	98%
23	95%
24	100%
25	25%

REPORTER CERTIFICATE

I, LEAH M. WILLERSDORF, Registered Professional Reporter, Certified Realtime Reporter, Fellow of the British Institute of Verbatim Reporters, Qualified Realtime Reporter Level 2, and Certified LiveNote Reporter, do hereby certify that:

TOMAS VAN DER HEIJDEN appeared before me on Thursday, March 17, 2022, was sworn by me, and was thereupon examined by counsel; that the testimony of said witness was taken and reduced to stenotype writing before me; that the foregoing is a true and accurate record to the best of my knowledge, skill and ability; that I am neither a relative nor employee of any party to the action in which this deposition was taken; nor am I a relative nor employee of any attorney or counsel employed by any party thereto; and, further, I am not financially or otherwise interested in the outcome of the action.

IN WITNESS WHEREOF I have hereunto set my hand this 28th of March 2022.

A handwritten signature in dark ink, appearing to read "L.M. Willersdorf", is written over a horizontal line.

LEAH M. WILLERSDORF
RPR-CRR-FBIVR-ACR-QRR2-CLR

Signature and Errata Sheet
March 17, 2022 Deposition of Tomas van der Heijden
Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS
Intelligence Inc.

I, Tomas van der Heijden, have reviewed the attached transcript of my March 17, 2022 deposition testimony and certify, pursuant 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page/Line	Now Reads	Correction	Reason
14:4	Philadelphia	Lexitas	Transcription error
161:12	spoke	spoken	Transcription error
182:16	they were	then we were	Transcription error
183:16	is we	is why	Transcription error
339:19	experts, didn't	experts, you didn't	Transcription error
384:10	dispersement	disbursement	Transcription error
428:19	using for	using it for	Transcription error

Executed on April 28, 2022, at Berlin, Germany.

